

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**TRAVELERS CASUALTY & SURETY COMPANY  
OF AMERICA**

**PLAINTIFF**

**VS.**

**CAUSE NO. 2:13cv101KS-MTP**

**HUB MECHANICAL CONTRACTORS, IN  
CARREME B. CURRY, GEORGE C. CURRY,  
CINDY B. CURRY, MARGIE C. FAILS,  
PHILIP A. FAILS, AND ARTHUR C. HENDERSON**

**DEFENDANTS**

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**UNOPPOSED MOTION FOR EXTENSION OF TIME**

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COMES NOW, Travelers Casualty and Surety Company of America (“Travelers”), and files this Unopposed Motion for Extension of Time within which to file its Answer to the Counterclaim of George and Cindy Curry [Doc 32] as follows:

1. George and Cindy Curry filed its Answer to Travelers’ Complaint on March 31, 2014, which Answer included a Counterclaim against Travelers.
2. Travelers’ Answer to the Counterclaim is due on April 21, 2014.
3. Due to Counsel’s travel schedule, Counsel respectfully requests an additional ten (10) days, up to and including May 1, 2014, within which to submit Travelers’ Answer.
4. Counsel for Travelers represents that this request for extension is made in good faith and not for purposes of delay.

5. Counsel for Travelers further represents that Counsel for George and Cindy Curry has been contacted and has no objection to the granting of the requested extension of time.

WHEREFORE, PREMISES CONSIDERED, Travelers Casualty and Surety Company of America respectfully requests that the Court enter an Order granting an additional ten (10) days, up to and including May 1, 2014, to file its Answer to the Counterclaim of George and Cindy Curry.

This the 15<sup>th</sup> day of April, 2014.

Respectfully submitted,

KREBS, FARLEY & PELLETERI, PLLC

By: /s/ Ellie B. Word  
ELLIE B. WORD, MSB# 100408  
ALEC M. TAYLOR, MSB# 102874

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*Counsel for Travelers Casualty & Surety Company of America*

**CERTIFICATE OF SERVICE**

I, ELLIE B. WORD, do hereby certify that I have this day electronically filed the above and foregoing with the Clerk of the Court using the ECF system which sent electronic notification of such filing to the following:

Mr. Christopher Solop  
Ms. Kimberly B. Taft  
Biggs, Ingram, Solop & Carlson, PLLC  
111 Capitol Building  
Post Office Box 14028  
Jackson, Mississippi 39236-4028

This the 15th day of April, 2014.

/s/ Ellie B. Word  
ELLIE B. WORD